

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator  
of the Estate of Areon J. Marion, Deceased

Plaintiff,

vs.

COOK COUNTY, ILLINOIS, et al.,

Defendants.

Case No.: 22-cv-6886

Judge Franklin U. Valderrama

Magistrate Judge Young Kim

**AGREED MOTION TO SUBSTITUTE PARTIES**

Defendants, Cook County, Illinois, Cook County Sheriff's Office, Yaser Haq, Ahleah C. Balawender PA-C, Jason Sprague, Lauren Cartwright, Nikki Ruffin, and Officer B. Vargas, ("Defendants") by their respective attorneys, move to substitute Cook County as the named Defendant and dismiss with prejudice the individually named Defendants. In support of this Motion, Defendants state:

1. Cook County is the indemnifying entity in the above-captioned lawsuit.
2. The Parties agree to substitute Cook County as the named Defendant, and dismiss with prejudice the individually named Defendants, Cook County Sheriff's Office, Yaser Haq, Ahleah C. Balawender PA-C, Jason Sprague, Lauren Cartwright, Nikki Ruffin, and Officer B. Vargas.
3. Parties will submit a stipulation to dismiss this case without prejudice to convert to a dismissal with prejudice, signed by both Parties.
4. Such stipulation of dismissal will be filed once the Parties sign the Settlement and Release Agreement.

5. The Parties agree that any dismissed parties may be reinstated if the Cook County Board does not approve the settlement of this matter.

6. Counsels for the Defendants has conferred with Counsel for the Plaintiff, and Plaintiff agrees with this Motion.

WHEREFORE, Defendants, Cook County, Illinois, Cook County Sheriff's Office, Yaser Haq, Ahleah C. Balawender PA-C, Jason Sprague, Lauren Cartwright, Nikki Ruffin, and Officer B. Vargas, request that an order of substitution be entered substituting Cook County for the named Defendants and the named Defendants be dismissed with prejudice.

Respectfully submitted,

KIMBERLY M. FOXX  
State's Attorney of Cook County

/s/Mia Buntic  
Mia Buntic  
Assistant State's Attorney  
Cook County State's Attorney's Office  
500 Richard J. Daley Center  
Chicago, Illinois 60601  
(312) 603-1434  
[Mia.Buntic@cookcountyil.gov](mailto:Mia.Buntic@cookcountyil.gov)

### **CERTIFICATE OF SERVICE**

I, Assistant State's Attorney, Mia Buntic, hereby certify that the above and foregoing was served upon Plaintiff's counsel electronically through the CM/ECF filing system on November 22, 2023.

/s/ Mia Buntic  
Mia Buntic